



USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/11/21

U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

January 11, 2021

VIA ECF

Honorable Gregory H. Woods
United States District Judge
United States District Court
500 Pearl Street, Room 2260
New York, NY 10007

MEMORANDUM ENDORSED

Re: *Charpentier, et al. v. Department of Homeland Security, et al.*, 20 Civ. 7510 (GHW)

Dear Judge Woods:

This Office represents the defendants (the “government”) in the above-referenced FOIA action. On behalf of both parties, I write to respectfully request a two-week adjournment of the initial pre-trial conference, *i.e.*, from the current scheduled conference of January 20, 2021 to February 3, 2021. Though plaintiffs’ counsel had previously entered a notice of non-availability starting January 24, 2021, *see* ECF No. 21, those plans have changed due to COVID, and plaintiffs’ counsel will be available in February.

This is the parties’ fourth joint request for an adjournment of the conference. The Court granted the parties’ previous joint requests for an adjournment of the conference on December 7 and 23, 2020 and January 6, 2021. *See* ECF Nos. 24, 26, 28. This extension is requested because plaintiffs’ counsel’s New York and Los Angeles offices have been shut down due to COVID cases in both offices, and to allow the parties additional time to confer regarding the FOIA requests.

I thank the Court for its consideration of this request.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

Application granted. The initial pretrial conference scheduled for January 20, 2021 is adjourned to February 3, 2021 at 1:00 p.m. The joint letter and proposed case management plan described in the Court’s September 16, 2020 order, Dkt. No. 9, are due no later than January 27, 2021.
SO ORDERED.

Dated: January 11, 2021

GREGORY H. WOODS
United States District Judge

s/ Rebecca R. Friedman
REBECCA R. FRIEDMAN
Assistant United States Attorney
86 Chambers Street, 3rd floor
New York, NY 10007
Tel: (212) 637-2614
Fax: (212) 637-2686
rebecca.friedman@usdoj.gov